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Attorneys for Defendants

SACRAMENTO HOUSING AND REDEVELOPMENT AGENCY,

LA SHELLE DOZIER, MARYLIZ PAULSON,

TORY LYNCH, TANYA CRUZ, TAMEKA

JACKSON, LISA MACIAS, TIFFANY BROWN,

and IBRA HENLY

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SYDNEY BROOKE ROBERTS and
DAVID TYRONE SAMUEL

Plaintiffs,

v.

SACRAMENTO HOUSING AND
REDEVELOPMENT AGENCY, et al.,

Defendants.

No.: 2:22-cv-01699 DJC AC

**DEFENDANTS' NOTICE OF MOTION TO
ENFORCE PARTIES' AGREEMENT TO
SETTLE AND DISMISS INSTANT LAWSUIT**

Assigned to Magistrate Allison Claire

DATE: June 25, 2025

TIME: 10:00 am

COURTROOM: 26

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:


NOTICE IS HEREBY MADE that Defendants will and hereby do move the Court for an Order enforcing the agreement by the parties to settle this matter by a dismissal of all claims.

This motion is made pursuant to legal principles regarding enforcement of contracts on the grounds that the parties' agreement to settle and dismiss this case is an enforceable contract that was breached by Plaintiffs' later withdrawal of their offer.

1 This Motion is based upon this Notice of Motion, the attached Memorandum of
2 Points and Authorities, the Separate Statement of Undisputed Material Facts, the
3 Declaration of Monica Castillo, the evidence concurrently filed herewith, and on all papers
4 and pleadings on file herein, and on such other and further oral and/or documentary
5 evidence as may be presented at or before the time of hearing on this Motion.

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8 Dated: June 13, 2025

**WILSON ELSEER MOSKOWITZ
EDELMAN & DICKER LLP**

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10 By: 
11 EDWARD P. GARSON
12 MONICA CASTILLO
13 Attorneys for Defendants
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CERTIFICATE OF SERVICE

Brooke Roberts, et al. v. Sacramento Housing and Redevelopment Agency, et al.
USDC, Eastern District of California, No. 2:22-cv-01699-TLN-AC

I certify that on *June 13, 2025*, I electronically filed the foregoing document(s) and that they are available for viewing and downloading from the Court's CM/ECF system, and that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Executed on June 13, 2025, at San Francisco, California.



Jasmine Carinio